

**BEFORE THE WASHINGTON UTILITIES AND TRANSPORTATION COMMISSION**

In the Matter of the Review of: Unbundled Loop and Switching Rates; the Deaveraged Zone Rate Structure; and Unbundled Network Elements, Transport, and Termination	Docket No. UT-023003
--	----------------------

**MOTION OF VERIZON NORTHWEST INC.  
FOR EXTENSION OF PAGE LIMITATIONS  
FOR INITIAL POST-HEARING BRIEF**

Verizon Northwest Inc. ("Verizon") respectfully seeks an extension of the page limitation for briefs imposed by WAC 480-07-396 from sixty (60) pages to one hundred and twenty-five (125) pages for Verizon's initial post-hearing brief, due July 15, 2004. Such an extension will assist the Commission in deciding the large number of complicated legal and costing issues in this proceeding, including the merits of two vastly different cost models. Indeed, as of this date, the parties have filed over 1750 pages of testimony and submitted 115 exhibits in this proceeding. Thus, a 125-page limit for its initial post-hearing brief is necessary to give Verizon a complete opportunity to comment on and respond to the large amount of testimony and exhibits at issue.

The length of Verizon's initial post-hearing brief in other cost proceedings supports Verizon's request that the page limit in this proceeding be increased here. For example, Verizon's post-hearing brief before the FCC's Wireline Competition Bureau in the Virginia cost proceeding was 172 pages, excluding non-recurring cost issues.

The other parties in this proceeding oppose Verizon's motion and have stated that they intend to seek a page limit extension of only one hundred (100) pages. While Verizon does not

object to the one hundred (100) page limit requested by the opposing parties, it believes that it needs more pages to respond to all the parties' positions, each of which criticizes Verizon's studies.

For the reasons stated above, Verizon respectfully requests that the Commission grant its motion for extension of the 60-page limitation to 125-pages for Verizon's initial post-hearing brief.

Respectfully submitted,

**Verizon Northwest Inc.**

By: 

Catherine Kane Ronis

Wilmer Cutler Pickering Hale and Dorr LLP  
2445 M Street, N.W.  
Washington, D.C. 20037  
(202) 663-6000